

# EXHIBIT I

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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

-----x  
IN RE GOOGLE PLAY STORE Case No.  
ANTITRUST LITIGATION 3:21-md-02981-JD

THIS DOCUMENT RELATES TO: MDL No. 2891

Epic Games Inc. v. Google LLC,  
et al.,  
Case No. 3:20-cv-05671-JD

In re Google Play Consumer  
Antitrust Litigation,  
Case No. 3:20-cv-05761-JD

In re Google Play Developer  
Antitrust Litigation,  
Case No. 3:20-cv-05792-JD

State of Utah, et al.,  
v. Google LLC, et al.,  
Case No. 3:21-cv-05227-JD

Match Group LLC, et al.,  
v. Google LLC, et al.,  
Case No. 3:22-cv-02746-JD

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\*HIGHLY CONFIDENTIAL - UNDER PROTECTIVE ORDER\*

REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF  
PURNIMA KOCHIKAR  
Wednesday, August 31, 2022

Reported By: Lynne Ledanois, CSR 6811

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1 Q If you could turn -- I'm going to point to  
2 you a few of the topics in here. If you can turn to  
3 Page 15, there is a Topic 16. Let me know when  
4 you're there.

5 A Yes, I'm there.

6 Q I'm not going to read the whole thing, but  
7 in a nutshell this is asking for testimony about  
8 negotiations with Activision Blizzard relating to  
9 Google Play and related topics.

10 Do you see that?

11 A Yes, I do.

12 Q And you're aware that Google designated  
13 you as Google's corporate representative to testify  
14 as to Topic 16?

15 A Yes.

16 Q And are you prepared to testify as  
17 Google's corporate representative on this Topic?

18 A Yes, I am.

19 Q Please turn to Page 17, Topic 25. Take a  
20 look at that topic, please.

21 A Yes.

22 Q This is asking, again without quoting, for  
23 Google's testimony about a number of project names  
24 and other sort of dealings with developers relating  
25 to Google Play.

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1 Do you see that?

2 A I do.

3 Q And are you aware that Google designated  
4 you to testify on behalf of Google as to this topic?

5 A Yes.

6 Q And are you prepared to testify as  
7 Google's corporate representative on Topic 25?

8 A I am.

9 Q Thank you. And finally, Page 20, you  
10 should see Topic 34, please.

11 A Yes.

12 Q And Topic 34 seeks testimony from Google  
13 about the benefits to Google from offering a diverse  
14 set of developers and apps on Google Play and  
15 related topics.

16 Do you see that?

17 A Yes.

18 Q And you're aware that Google designated  
19 you to testify on behalf of Google on this topic?

20 A Yes.

21 Q And are you prepared to testify as  
22 Google's corporate representative on Topic 34?

23 A Yes, I am.

24 Q Just a quick question on this one. What  
25 did you do specifically to prepare on Topic 34?

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1           A     Yes.

2           Q     And he said that the deal is only worth it  
3 if it saves Play.

4                     Do you see that?

5           A     Yes, when you -- yes. No individual title  
6 saves anything, right. I do think he's pointing out  
7 if the risk to Play is lowered.

8           Q     Well, the concern that was discussed at  
9 the time was that if ABK launched an alternative  
10 Android app store, that could lead to other  
11 developers either launching their own app store or  
12 launching their titles through ABK's alternative app  
13 store; correct?

14          A     It was discussed.

15          Q     And stopping Activision from launching its  
16 own alternative app store would stop that potential  
17 contagion risk that was just identified?

18          A     Getting Activision to commit to Play, they  
19 could still continue to invest in the app store. None  
20 of our conversations was contingent upon them stopping  
21 anything. We just wanted them to understand the value  
22 Play can bring and, more importantly, the value Google  
23 can bring.

24          Q     But your expectation was that if you could  
25 secure their launch on Play, that Activision

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1     Blizzard King would not spend their time and money  
2     investing on an alternative Android app store;  
3     correct?

4             A       That they would see the value of building  
5     games versus -- yes.

6             Q       If you look to the first page of this  
7     email.

8             A       Yes.

9             Q       The top email is from you after various  
10    back and forth where it starts, "If we don't do a  
11    deal."

12                    Do you see that?

13             A       Yes.

14             Q       You say, "If we don't do a deal, ABK will  
15    continue to try different ways to get revenues off  
16    of Play."

17                    Do you see that?

18             A       Yes.

19             Q       You go on to say, "Building a stronger  
20    relationship," et cetera, "will preclude investments  
21    in alternative ways of monetizing off Play."

22                    Do you see that?

23             A       Yes.

24             Q       You also refer to the alternative Android  
25    app store as one of the options that they were

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1 didn't do any other investigation on that topic.

2 Q One of the other Hug targeted developers  
3 was Riot Games, as you mentioned earlier; right?

4 A Yes.

5 Q Google, in fact, did sign a Project Hug  
6 deal with Riot?

7 A Yes.

8 Q And one of the risks that Riot presented  
9 was that Riot would launch its game outside of  
10 Google Play?

11 A Yes.

12 Q Let's do another document. Give it one  
13 chance to load here.

14 MS. MOSKOWITZ: It will be, when it's  
15 loaded, GOOGLE-PLAY-007424789 through 4790. This  
16 will be PX1523.

17 (Exhibit 1523 was marked for identification  
18 by the court reporter.)

19 THE WITNESS: Not loaded yet.

20 BY MS. MOSKOWITZ:

21 Q No problem, I was late in asking for it.

22 A Yes, I have it.

23 Q This is a document titled "Riot GVP Deal."  
24 Do you see that?

25 A Yes.

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1 Q And it says, "A year ago, we pulled all  
2 stops."

3 A Yes.

4 Q Paren, "promised them \$10 million  
5 co-marketing for before they signed" Hug, for  
6 example.

7 Do you see that?

8 A Yes.

9 Q It says that you pulled all those stops to  
10 "get Riot to stop their in-house 'app store'  
11 efforts."

12 Do you see that?

13 A Yes.

14 Q So that \$10 million in co-marketing was  
15 before there was even a Project Hug deal on the  
16 table?

17 A Oh, before they signed the deal. I think  
18 Hug -- I think the Games Velocity Program was at least  
19 being discussed. This was before they signed the GVP  
20 deal.

21 Q It was also before the Business Council  
22 approved it; correct? Before the Business Council  
23 approved Project Hug; correct?

24 A Probably. I can't think about the dates,  
25 however, it's worth noting that we often do



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1 co-marketing things which are outside of GVP. The  
2 Games Velocity Program is a very specific thing. We  
3 do tons of different co-marketing and other  
4 partnership co-investments.

5 Q So at the time this co-marketing was used  
6 to stop the in-house app store efforts that Riot was  
7 doing, Riot had told you that it was in the process  
8 of developing its own app store; correct?

9 A Riot had told us and we were working very  
10 hard -- as you can see, we're always trying very hard  
11 to make sure that we can win businesses. The  
12 competition is tough. And we told Riot that we can  
13 really invest in growing.

14 Riot was also coming from a very  
15 console/PC world where they had a certain kind of  
16 business model where people would say, this is the  
17 marketing commitment we do. This is how we would  
18 promote you, et cetera.

19 So we had to figure out a common language  
20 before we could even understand what mobile does and  
21 how mobile works.

22 So that was our work with them. We  
23 literally had multiple workshops for them to  
24 understand even how mobile works.

25 Q And if you wanted them to come to mobile

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1 through Google Play Store rather than through their  
2 own alternative Android app store?

3 A We wanted them to consider Play Store. They  
4 could still continue to work on their app store.

5 Q The way you wrote this is that you pulled  
6 out all the stops to get Riot to stop their in-house  
7 app store efforts. Isn't that what you wrote?

8 A That is what's our perhaps, you know, lofty  
9 ambition. But there was no conversation about them  
10 stopping anything.

11 Q But they did?

12 A It was much more about value that we can  
13 bring.

14 Q But they did stop; right?

15 A Well, they did not succeed on mobile.

16 Q But they didn't launch an app store either  
17 on Android; correct?

18 A They didn't, but neither did their apps do  
19 well.

20 Q So separate from how their games  
21 performed, Riot did not launch an Android app store  
22 on Android; correct?

23 A Yes.

24 Q They also did not launch any of their apps  
25 outside of Google Play; correct?